



August 11, 2006

Senator Charles Grassley, Chairman  
Committee on Finance  
U.S. Senate  
219 Dirksen Senate Office Building  
Washington, DC, 20510  
E-mail: [mtb2006@finance-rep.senate.gov](mailto:mtb2006@finance-rep.senate.gov)

REF: Request for Comments on Miscellaneous Tariff Measures (July 11, 2006 Press Release)

Dear Chairman Grassley:

On behalf of the American Apparel and Footwear Association – the national trade association of the apparel and footwear industries, and their suppliers – I am writing to express strong support for the following bills identified in the subject press release.

**S 3080, S 3124, S 3198, S 2833, S 2834, S 2835, S2836, S 2837, S 2841, S 2842, S 2843, S 2844, S 2845, S2846, S 2848, S 3124, S 3477, S 3571, S 3572, S 3573, S3574, S3575, S3576, S 3669, S 3670, S 3671, S 3672, S 3673, S3674, S 3735, S 3736 – Duty suspensions with respect to various footwear articles.**

*Comment.* AAFA strongly supports these provisions. We are not aware of any domestic production of any of these footwear articles. Moreover, in the few cases where these bills cover the 17 footwear items that the Rubber & Plastics Footwear Manufacturers Association (RPFMA) identify as still being manufactured in the United States, the measures were crafted and refined, with the assistance of RPFMA and domestic industry, to ensure that they do not affect any domestic production of footwear.

**S 3123, S 3125, S 3126, S 3127, S. 3393, S. 3394, S. 3396, S. 3397, S. 3400, S. 3401, S.3402, S. 3403, S 3493, S 3494 – Duty suspensions with respect to ski, snowboard and other water-resistant pants (i.e. performance outerwear pants) and bills to remove such pants from any sort of U.S. import quotas.**

*Comment.* AAFA strongly supports these provisions. AAFA was involved in the development of these pieces of legislation. There is no domestic production of performance outerwear pants. Therefore, subjecting imports of such pants to duties or quotas provides no benefits to U.S. manufacturers while subjecting U.S. companies and U.S. consumers to additional costs.

**S 3241/S 3242 – Two bills to provide duty suspensions with respect to various backpacks.**

*Comment.* AAFA strongly supports these provisions. We are not aware of any domestic production of any of these backpacks.

**S. 1954 – A bill to amend the General Notes of the HTS to give products imported from U.S. insular possessions the same treatment as products imported from FTA countries.**

*Comment:* AAFA strongly supports this legislation. We have previously communicated to the Committee our strong support for this measure, and our desire to see this bill included in the miscellaneous tariff bill.

**S. 738/S. 3344 – Bills to provide suspension of duty for certain cotton shirting fabrics.**

*Comment:* AAFA strongly supports this legislation. Our association supported an earlier version of this legislation in the 108<sup>th</sup> Congress. This legislation would result in duty elimination for cotton fabrics that are already designated in short supply under various trade preference programs because these fabrics are unavailable in the United States and in the preference countries. Given that finished shirts may enter duty free using these fabrics, we believe it is also appropriate to permit the fabrics themselves to enter duty free. Thus, U.S. domestic manufacturers of shirts will be able to enjoy equal access to those same high quality fabrics that foreign-based manufacturers enjoy.

**S. 3164 - A bill to extend trade benefits to certain tents imported into the United States.**

*Comment.* AAFA strongly supports this provision. This legislation relates to certain camping tents, which are not made in the United States. Moreover, similar but slightly smaller tents, differentiated only by the fact that they are classified as “backpacking” tents, already enjoy duty free treatment. This provision would correct that anomaly.

**S. 3051, 3052, 3053, and 3054 - Bills to provide suspension of duty for certain fibers.**

*Comment.* AAFA strongly supports these provisions. Each of these fibers is a unique, innovative product, which is not available in the United States. Therefore, subjecting imports of the subject fibers to duties or quotas provides no benefits to U.S. manufacturers while subjecting U.S. companies and U.S. consumers to additional costs.

In addition, we note the inclusion of a number of other provisions relating to various yarns, fabrics and fibers. While we are not taking a position on any of these provisions we would suggest that reduction in duties in those articles is more likely to sustain U.S. jobs by providing U.S. manufacturers access to foreign inputs when those inputs are no longer available in the United States. Moreover, inasmuch as many free trade agreements now contain yarn and/or fiber forward principles, enactment of such provisions may also facilitate proper findings of short supply for those programs, which would also support U.S. jobs dependent on those production-sharing relationships.

Finally, we have not commented on bills that were included in the trade provisions section of the HR 4 – the Pension Protection Act of 2006.

Please contact me should you require additional information on these or other provisions.

Respectfully submitted,



Stephen Lamar  
Senior Vice President



August 14, 2006

Attn: MTB  
Senate Finance Committee  
219 Dirksen Senate Office Building  
Washington, DC, 20510

**Re: S 3054 - To suspend temporarily the duty on synthetic staple fiber.**

Dear Senate Finance Committee Chairman and Members:

DAK Americas LLC is opposed to Senate bill S 3054 to suspend temporarily the duty on synthetic staple fiber.

DAK Americas LLC is a United States manufacturer of specialty moisture management and anti-microbial polyester staple products. We do not support the suspension of the duties for the subject fibers. (9902.55.06 Synthetic staple fiber of polyester; cruciform (tetralobal) cross section, measuring less than 3.3 decitex, carded, combed or prepared for spinning) referenced in this proposed bill.

We have plentiful supply of products we produce for sale and distribution to customers within the U.S. that deliver the same functionality and performance characteristics of the subject fibers.

Sincerely,

Richard A. Lane, Jr.  
Manager – Trade Relations  
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July 24, 2006

The Honorable Charles Grassley  
Chairman, Senate Finance Committee  
Senate Finance Committee  
SD-219  
U.S. Senate  
Washington, DC 20510

**Re: S. 3054 to temporarily suspend the duty on synthetic staple fiber**

Dear Mr. Chairman:

INVISTA is the proponent of S. 3054 and strongly supports suspending the duty on this synthetic polyester staple fiber of cruciform cross section, which is combed and processed into tops form for woolen system blending. The individual fibers measure 2.25 to 2.75 decitex, and the end use applications are apparel. The item is currently classified under HTS 5506.20.00.

INVISTA is one of the world's largest integrated fibers, polymer, and intermediates companies, producing and marketing to the apparel, performance fibers, interiors, intermediates, and resins industries. It is recognized across the globe through its well-known brands and trademarks, including: LYCRA®, STAINMASTER®, ANTRON®, and COOLMAX®. INVISTA is a wholly owned, but independently managed, subsidiary of Koch Industries, Inc. We are committed to meeting the needs of our customers through technology innovations.

The fiber has a cruciform (or high modification tetralobal) cross section, rather than the traditional round cross section. It provides exceptional consumer performance characteristics when spun into a yarn and woven into a fabric, creating improved comfort in apparel. This is a very small volume, premium priced product that is a response to U.S. textile mills' demands for innovative, technologically sophisticated offerings. Availability of advanced products such as this is what is needed to sustain the U.S. textile industry. U.S. import duties on this product are considered an unnecessary burden.

This item is one of a large family of products that may be used under INVISTA's COOLMAX® fabric certification program. This program was created by INVISTA and is promoted by our company to garment brands, retailers, and consumers. The certification requires that the fabrics demonstrate certain performance characteristics, and it requires that the fabrics be made with a minimum content of qualifying fibers. Only INVISTA fibers will qualify for the certification. There are no domestic suppliers commercially producing this cruciform cross sectioned form of polyester staple fiber.

We urge Congressional passage of S. 3054.

Sincerely,

A handwritten signature in dark ink, reading "Mary K. Vane", with a stylized, cursive script.

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